

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

HELIOS STREAMING, LLC, and
IDEAHUB, INC.,

Plaintiffs,

v.

VUDU, INC.,

Defendant.

C.A. No. _____

JURY TRIAL DEMANDED

**HELIOS STREAMING, LLC AND IDEAHUB, INC'S
MOTION FOR LEAVE TO FILE UNDER SEAL**

Pursuant to Federal Rule of Civil Procedure 26, Plaintiffs Helios Streaming, LLC and Ideahub, Inc. (collectively, "Helios" or "Plaintiffs") respectfully move for entry of an Order authorizing Plaintiffs to file under seal exhibits 2, 4, 6, 8, 10, 12, 14, 16, 18, 20 and 22 in support of their Complaint, filed contemporaneously herewith. In support of this Motion, Plaintiffs state as follows:

1. Public disclosure of the confidential exhibits will violate Plaintiffs' and Defendant's established privacy interests because the exhibits embody Plaintiffs' detailed preliminary infringement analysis of the code, algorithms, and other confidential materials underlying Defendant's accused products and services. It is not anticipated that Defendant will oppose this motion, as they will already have access to the confidential exhibits.

2. Plaintiffs will comply with all applicable local rules and procedures regarding filing under seal through the Court's CM/ECF system, including the requirement to file a redacted version within seven (7) days of filing the sealed documents.

WHEREFORE, Plaintiffs respectfully request entry of the attached order permitting the

filings under seal of exhibits 2, 4, 6, 8, 10, 12, 14, 16, 18, 20 and 22 to their Complaint.

Dated: September 24, 2019

DEVLIN LAW FIRM LLC

/s/Timothy Devlin

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